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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

THE ESTATE OF CHRISTOPHER ROSALES,  
by and through RAMIRO ALVARADO-  
ROSALES as Special Administrator; RAMIRO  
ALVARADO-ROSALES, individually, SADEE  
GRACE ROSALES, A MINOR, by and through  
BRYTTNY RAENE HENSON, her natural  
parent and guardian, as assignees of CTD LABS,  
LLC, a foreign limited liability company,

Plaintiffs,

v.

CERTAIN UNDERWRITERS AT LLOYDS OF  
LONDON SUBSCRIBING TO POLICY  
NUMBERS SAPPHIRE BLUE, a series of RSG  
UNDERWRITING MANAGERS, LLC, a  
foreign limited liability company; DOES I  
through X; and ROE CORPORATIONS I  
through X,

Defendants.

Case No: 2:20-cv-00598-KJD-VCF

**STIPULATION AND [PROPOSED] ORDER  
FOR EXTENSION OF TIME FOR  
DEFENDANTS TO FILE RESPONSIVE  
PLEADING TO PLAINTIFF'S FIRST  
AMENDED COMPLAINT**

**(First Request)**

Plaintiffs, the Estate of Christopher Rosales, by and through Ramiro Alvarado-Rosalas as  
Special Administrator, Ramiro-Alvarado-Rosales, individually, Sadee Grace Rosales, a minor, by  
and through Bryttny Raene Hensen, her natural parent and guardian (collectively the "Plaintiffs"), by  
and through their counsel of record, Jerome R. Bowen, Esq. of Bowen Law Offices; and Defendants,  
Certain Underwriters at Lloyds of London Subscribing to Policy Numbers, and RSG Underwriting  
Managers, LLC (erroneously sued as Sapphire [sic] Blue, a series of RSG Underwriting Managers,

1 LLC) ("Defendants"), by and through their counsel of record, Chad C. Butterfield, Esq. of Wilson,  
2 Elser, Moskowitz, Edelman & Dicker, LLP, hereby stipulate and agree to extend the deadline for  
3 Defendants to file a responsive pleading to Plaintiffs' First Amended Complaint by thirty (30) days,  
4 from April 6, 2020 to **May 6, 2020**.

5 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the  
6 requested extension. The ongoing concerns related to the COVID-19 pandemic and restrictions  
7 imposed on social gathering have impacted the operations of Defendants and undersigned counsel's  
8 office, and have resulted in numerous logistical issues. Accordingly, the parties agree that the  
9 requested extension furthers the interests of this litigation and is not being requested in bad faith or  
10 to delay these proceedings unnecessarily.

11 This is the parties' first request for extension of the deadline.

12 DATED this 6th day of April, 2020.

13 **WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP**

14 /s/ Chad C. Butterfield

15 CHAD C. BUTTERFIELD

16 Nevada Bar No. 10532

17 300 South Fourth Street, 11<sup>th</sup> Floor

18 Las Vegas, NV 89101

19 *Attorneys for Defendants*

20 DATED this 6th day of April, 2020.

21 **BOWEN LAW OFFICES**

22 /s/ Jerome R. Bowen

23 JEROME R. BOWEN, ESQ.

24 Nevada Bar No. 4540

25 9960 w. Cheyenne Ave., Suite 250.

26 Las Vegas, NV 89129

27 *Attorney for Plaintiffs*

28 **ORDER**

**GOOD CAUSE SHOWN, IT IS SO ORDERED.**

Dated this 6th day of April, 2020.

29   
UNITED STATES MAGISTRATE JUDGE